

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

LAURA ELLEN LEWIS,)
)
Plaintiff,)
)
v.) **Case No. 2:11-CV-455-AKK**
)
)
HASKELL SLAUGHTER)
YOUNG & REDIKER, LLC)
)
Defendant.)

MOTION TO WITHDRAW AND NOTICE OF ATTORNEY'S LIEN

COMES NOW Alicia K. Haynes, and the law firm of Haynes & Haynes, P.C. as counsel for Plaintiff, Laura Ellen Lewis, and moves the Court to grant this Motion to Withdraw as counsel for the Plaintiff, and further gives notice of the filing of this lien for legal fees, services rendered and costs expended with regard to legal representation of the Plaintiff in this matter. In support thereof, the undersigned states the following:

1. Plaintiff has retained other counsel named, Adam Morel.
2. The undersigned advised Plaintiff that she would be filing a motion to withdraw from her case and further an attorney's lien for attorney fees and costs rendered to date in this matter.

3. Counsel for Defendant presented the undersigned with an Offer of Judgment in this matter, which was immediately forwarded to Plaintiff.

4. In response, Plaintiff requested the undersigned withdraw from further representation in this matter, and disclaim any and all interest in a future settlement and/or judgment.

5. In accordance with § 34-3-61, Ala. Code (1975), and any other applicable statutes, counsel requests a quantum meruit lien for the time and expenses put forth in this case. Counsel and her firm members have spent an excess of 200 hours working Plaintiff's case and incurred over \$2,000.00 in case expenses. A more detailed listing of the time spent and expenses incurred are available for the court to review if needed.

WHEREFORE, counsel prays for an Order granting her Motion to Withdraw as counsel of record for Plaintiff, Laura Ellen Lewis, and for an Order allowing her filing of an Attorney's Lien, both for actual costs and for quantum meruit.

Respectfully submitted,

/s/ Alicia K. Haynes
Alicia K. Haynes
Attorney for Plaintiff

OF COUNSEL:

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ASB-8327-E23A

CERTIFICATE OF SERVICE

I hereby certify that on this the 26th day of April, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/EMF system which will serve notification of such filing to Counsel for Defendant, and upon Plaintiff, Laura Ellen Lewis via email transmission and by placing a copy of same in the U.S. Mail, via Certified Mail, properly addressed and postage prepaid.

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/s/ Alicia K. Haynes
OF COUNSEL